

Message Text

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ACTION EB-07

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FM AMEMBASSY LONDON

TO MARAD WASHDC

INFO SECSTATE WASHDC 0385

UNCLAS SECTION 01 OF 02 LONDON 05976

FOR H. FEIGLESON, OFFICE OF ADVANCED SHIP OPERATIONS,
MARAD FROM WHEATLEY

E.O. 11652: N/A

TAGS: EWWT

SUBJ: MARAD POSITION ON MARINE TRAFFIC REQUIREMENTS

1. FOLLOWING COMMENTS ARE GENERAL IN NATURE AND REPRESENT THE ABBREVIATED VIEWS OF MARAD AS THEY HAVE BEEN INCORPORATED INTO THE AGENCY POSITION ON "MARINE TRAFFIC REQUIREMENTS....." DATED JANUARY 29, 1975.

2. OTHER ITEMS THAT CAN BE INCORPORATED COULD BE THE JOINT MA/CG TASKS INVOLVING "CREW SKILLS ANALYSIS - STANWICK PHASE I" AND THE BROAD UTILIZATION OF CAORF TO ASSIST IN THE DEVELOPMENT OF STANDARDS AND CRITERIA FOR SHIP OPERATIONS AND CONTROL, AT SEA AND IN THE PORT/HARBOR AREAS.

3. TEXT FOLLOWS:

THE CONVENING OF THIS SYMPOSIUM DEALING WITH VESSEL OPERATIONS IN HARBOR AND CONFLUENCE AREAS IS VIEWED BY THE MARITIME ADMINISTRATION AS TIMELY.

THE CURRENT DEMAND FOR SHIPPING SYSTEMS THAT ARE BOTH HIGHLY PRODUCTIVE AND EXHIBITING IMPROVED CAPABILITIES WITH REGARD TO SAFETY BOTH AT SEA AND IN THE COASTAL AND PORT AREAS HAS RESULTED IN THE DEVELOPMENT OF NEW

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RULE MAKING IN RESPONSE TO LEGISLATION IN THE FORM OF THE

PORTS AND HARBOR SAFETY WATERWAY ACT OF 1974.

THIS GATHERING OF ALL INTERESTED GROUPS CONCERNED WITH VESSEL SAFETY AND PRODUCTIVITY AFFORDS A FORUM FOR CONSTRUCTIVE DISCUSSION AS IT RELATES TO BOTH PORT AND VESSEL OPERATIONS. INDIRECTLY, IT OFFERS A FURTHER OPPORTUNITY TO EXPRESS MORE SPECIFIC COMMENTS ON THE PROPOSED RULE MAKING ALTHOUGH IT IS MY UNDERSTANDING THAT FORMAL DISCUSSIONS ON MARINE TRAFFIC REQUIREMENTS, 33 CFR SUB CHAPTER D WILL BE HELD UNDER THE AEGIS OF THE USCG AT SOME FUTURE DATE.

LET ME START MY DISCUSSION BY STATING THAT MARAD UNEQUIVOCALLY SUPPORTS THE CURRENT PROGRAM OF THE USCG IN THE VITAL AREA OF IMPROVING SHIP OPERATIONS AS RELATED TO VESSEL SAFETY. LET ME HASTEN TO ADD THAT PRODUCTIVITY OR IMPROVED EFFICIENCY OF VESSEL OPERATIONS IS ALSO GIVEN A HIGH PRIORITY BY MARAD SINCE THE COMPETITIVE POSITION OF THE US FLAG FLEET AND THE ENHANCEMENT OF THAT POSITION REMAINS AS A KEY OBJECTIVE WITHIN THE AGENCY.

I WOULD PREFER TO BRIEFLY DISCUSS OUR VIEWS ON THE DEVELOPMENT AND IMPLEMENTATION OF NEW TECHNOLOGY RELATING TO VESSEL OPERATIONS WITH PARTICULAR EMPHASIS ON THE ESTABLISHMENT OF REQUIREMENTS, AND, THE SUBSEQUENT TEST AND EVALUATION OF NEW SYSTEMS IN RESPONSE TO REQUIREMENTS.

TODAY, PRESSURES FROM VARIOUS SOURCES ARE SEEKING NEW OR UPDATED REGULATIONS RELATING TO LICENSING AND CERTIFICATION OF PERSONNEL, ESTABLISHMENT OF IMPROVED WORLD-WIDE STANDARDS FOR DESIGNATING SKILLS OF THE VARIOUS RATINGS OF SHIPBOARD PERSONNEL TOGETHER WITH COMPARABLE INTERESTS IN PROCEDURES AND EQUIPMENTS THAT ARE ASSOCIATED WITH VESSEL OPERATIONS. WHILE WE FULLY SUPPORT THESE ACTIVITIES WE HASTEN TO ADD THAT IN OUR JUDGEMENT, THE ESTABLISHMENT OF CLEARLY DEFINED REQUIREMENTS PERTAINING TO VESSEL PERFORMANCE AND PERSONNEL PERFORMANCE MUST BE CONSIDERED BEFORE ANY SPECIFIC OR SUBSTANTIVE REGULATIONS CAN BE IMPLEMENTED. IN MANY INSTANCES IN THE PAST, ASSUMPTIONS HAVE BEEN MADE WITH REGARD TO THE DESIGNATION OF EQUIPMENT AND THE INSTITUTION OF PROCEDURES WHICH FURTHER ASSUME THAT THE PROPER USE AND PERFORMANCE OF THE EQUIPMENT WILL SUFFICE

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TO ENHANCE OVERALL SAFETY OPERATIONS. WHAT HAS BECOME OBVIOUS AFTER CAREFUL REVIEW IS THAT THE PERFORMANCE CRITERIA ARE UNCERTAIN IN SOME INSTANCES AND IN FURTHER CASES SIMPLY UNKNOWN. IN SHORT, A "SHOTGUN" APPROACH TO THE SOLUTION IS USED WHICH CAN BE COSTLY AS WELL AS INEFFECTIVE.

ACCORDINGLY, WE RECOMMEND THAT THOSE OF US RESPONSIBLE FOR DIRECTING TECHNOLOGY IN THE MARITIME INDUSTRY,

ESTABLISH PROGRAMS TO DEFINE AND DEVELOP REQUIREMENTS
AND STANDARDS UTILIZING ALL AVAILABLE EXPERIENCE AND

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TO MARAD WASHDC

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FOR H. FEIGLESON

FACILITIES. A CAREFUL ANALYTICAL APPROACH TO THE DEFINITION OF FUNCTIONAL REQUIREMENTS WILL RESULT IN IMPROVED SYSTEMS DEVELOPMENTS WITH THE SUBSEQUENT ENHANCEMENT OF SAFETY, VESSEL OPERATIONS WHILE CONCURRENTLY MINIMIZING THE IMPACT ON SHIPPING SYSTEM PRODUCTIVITY.

THERE REMAINS A QUESTION OF PERSONNEL REQUIREMENTS ON BOTH THE NATIONAL AND INTERNATIONAL LEVEL. CURRENT IMCO ACTIVITIES INVOLVING STANDARDS OF WATCHKEEPING IN ADDITION TO THE CHANGES IN POLICIES RELATING TO EXAMINATION AND TRAINING OF LICENSED AND UNLICENSED PERSONNEL SIGNAL A MAJOR WORLDWIDE CONCERN ON THE PART OF ALL RESPONSIBLE ORGANIZATIONS FOR STANDARDS TO ENHANCE THE SAFETY OF VESSEL OPERATIONS. THE IMPACT OF THE "MAN IN THE LOOP" CANNOT BE OVER EMPHASIZED. FURTHER IN-DEPTH ANALYSIS OF BOTH THE REQUIREMENTS AND THE ENVIRONMENT IN WHICH SEAFARERS MUST FUNCTION SHOULD BE UNDERTAKEN TO BETTER DEFINE MEANS TO ENHANCE THE ABILITIES OF PERSONNEL WHO MAN AND OPERATE THE VESSELS OF THE WORLD. ALL TOO OFTEN "OPERATOR ERROR" IS CITED AS THE CAUSE OF MAJOR MARINE ACCIDENTS AND IT APPEARS THAT THIS CONDITION
BLEMS.

TODAY, AN EXTENSIVE AMOUNT OF TECHNOLOGY IS AVAILABLE TO NOT ONLY ENHANCE THE SAFETY OF VESSEL OPERATIONS BUT ALSO THE PRODUCTIVITY OF SHIPPING SYSTEMS. ALL TOO OFTEN WE TEND TO VIEW IMPROVEMENTS IN SAFETY WITH REDUCT-
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IONS IN EFFICIENCY, PARTICULARLY IN THE OPERATIONS OF SHIPS. ALL TOO OFTEN WE HAVE BEEN DEPENDENT ON THE SEAMAN'S EYE OR INTUITIVE SENSES OF THE SEAFARER AS THE BEST MEANS OF PROGRAMMING ACTIONS RELATING TO VESSEL OPERATIONS.

IT IS OUR CONTENTION THAT THE TECHNOLOGY CURRENTLY EXISTS TO BRING TO THE RESPONSIBLE PERSONS SUFFICIENT OPERATIONAL INTELLIGENCE RELATING TO VESSEL POSITION AND ENVIRONMENTAL HAZARDS TO FACILITATE IMPROVED DECISION MAKING IN MOMENTS OF IMMEDIATE THREAT OR STRESS THROUGH THE FURTHER DEVELOPMENT OF SENSING EQUIPMENT AND THE SUPPORT SYSTEMS TO PROCESS THE DATA IN A MANNER THAT WILL SUGGEST AN OPTIMUM DECISION. RESULTS TO DATE IN THE DEVELOPMENT OF THESE SYSTEMS HAS BEEN GRATIFYING AND WE ARE CONTINUALLY ASSESSING NEW TECHNOLOGICAL DEVELOPMENTS IN SUPPORT OF THE OBJECTIVES OF IMPROVED SAFETY WITH CONCURRENT ENHANCEMENT OF BOTH VESSEL AND PERSONNEL PRODUCTIVITY.

EXTREME CARE SHOULD BE TAKEN IN RULE MAKING AND THE DEVELOPMENT OF PROCEDURES TO INSURE THAT THESE NEW DEVELOPMENTS CAN BE ADEQUATELY EVALUATED AND ULTIMATELY EMPLOYED TO THE BENEFITS OF BOTH VESSEL SAFETY AND SYSTEM PRODUCTIVITY.

TODAY WE STAND ON THE THRESHOLD OF A MAJOR CHALLENGE IN SHIPS OPERATIONS. WITH THE ADVENT OF THE 30 KNOT CONTAINER SHIP, 450,000 DWT TANKER, HIGH COST LNG CARRIERS AND A CONCURRENT INCREASE IN COASTAL AND CONFLUENT TRAFFIC DENSITIES, WE MUST MAKE EVERY EFFORT TO ESTABLISH REALISTIC REQUIREMENTS FOR VESSEL OPERATIONS AND CONTROL; DESIGN AND INCORPORATE IMPROVED SENSING AND INFORMATION DISPLAY SYSTEMS; CONTINUOUSLY REVIEW OUR STANDARDS OF EDUCATION AND TRAINING AND SEARCH FURTHER INTO THE HUMAN ENGINEERING AND MOTIVATIONAL FACTORS THAT INFLUENCE THE CREWS AND PERSONNEL DIRECTLY RESPONSIBLE FOR THE OPERATION OF THESE VESSELS. THE TECHNOLOGY AND THE MEANS ARE AT HAND AND ALTHOUGH WE ARE DEALING WITH AN INDUSTRY AND A SYSTEM THAT ARE AT TIMES HIDEBOUND BY CUSTOMS AND STEEPED IN TRADITIONS, WE MUST AVAIL OURSELVES OF ALL RESOURCES TO ENHANCE THE PRODUCTIVITY OF THE US FLAG FLEETS WHILE CONCURRENTLY MAINTAINING HIGH STANDARDS OF SAFETY FOR THE SHIPS, CREW AND CARGO -- AND PRESERVING OF OCEAN,
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COASTAL AND HARBOR ENVIRONMENTS.

RICHARDSON

NOTE BY OC/T: SECTION 2 OF 2 LONDON 5976; #AS RECEIVED.
CORRECTION TO FOLLOW.

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